

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(GREENBELT)**

UNITED STATES OF AMERICA,

v.

VADIM MIKERIN

Criminal No.: 8:14-CR-00529-TDC

**DEFENDANT VADIM MIKERIN'S MOTION TO DISMISS THE INDICTMENT FOR
INSUFFICIENCY**

Defendant Vadim Mikerin, through his undersigned counsel, hereby moves this Court pursuant to Rule 12(b) of the Federal Rules of Criminal Procedure for entry of an Order dismissing the Indictment for insufficiency as it fails to state an offense. In support hereof, Mr. Mikerin submits the accompanying Memorandum of Law.

WHEREFORE, Mr. Mikerin respectfully requests that the Court dismiss the Indictment that is the subject of this action for insufficiency as the Government has failed to properly state an offense.

Dated: March 13, 2015

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ Jonathan E. Lopez
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court of the United States District Court for the District of Maryland using the CM/ECF system on March 13, 2015.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

Dated: March 13, 2015

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

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